

EXHIBIT 1

1. COPY CERTIFICATION BY DOCUMENT CUSTODIAN, dated 12 December 2013 (1 leaf);
2. AMENDED PLEA AGREEMENT, dated 25 November 2013 (6 leaves);
3. SECOND NOTICE AS TO AMENDED PLEA AGREEMENT in Case #: 6:13-cr-00170-JMC, dated 27 November 2013 (3 leaves); and
4. NOTICE OF DEFAULT CONSENT TO JUDGMENT AMENDED PLEA AGREEMENT—ADMINISTRATIVE PROCESS, dated 4 December 2013 (4 leaves);

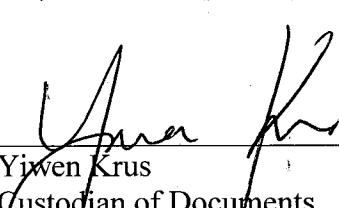
COPY CERTIFICATION BY DOCUMENT CUSTODIAN

State of Arizona)
) Affirmed and Subscribed
County of Maricopa)

I, Yiwen Krus, do certify that, on the 12th day of December, 2013, I personally made the attached copy of:

- 1) AMENDED PLEA AGREEMENT, dated 25 November 2013 (6 leaves);
- 2) SECOND NOTICE AS TO AMENDED PLEA AGREEMENT in Case #: 6:13-cr-00170-JMC, dated 27 November 2013 (3 leaves); and
- 3) NOTICE OF DEFAULT CONSENT TO JUDGMENT AMENDED PLEA AGREEMENT—ADMINISTRATIVE PROCESS, dated 4 December 2013 (4 leaves);

from the copies of these documents in my possession, and are true, exact, complete, and unaltered copies.



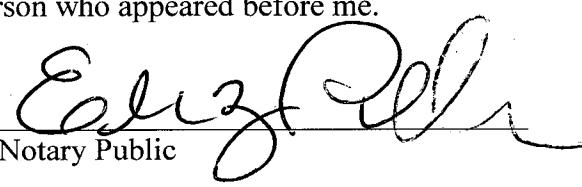
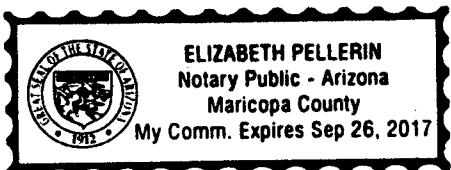
Yiwen Krus
Custodian of Documents
295 North Rural Road, Unit 147
Chandler, Arizona

JURAT

State of Arizona)
)
County of Maricopa)

Subscribed and affirmed before me this 13 day of December, 2013, by Yiwen Krus, proved to me on the basis of satisfactory evidence to be the person who appeared before me.

(seal)



Notary Public

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

UNITED STATES OF AMERICA)	Criminal No. 6:13-cr-00170-JMC-1
)	
Plaintiff)	
)	
v.)	AMENDED PLEA AGREEMENT
)	
GORDON L HALL)	
Defendant.)	
)	

GENERAL PROVISIONS

This AMENDED PLEA AGREEMENT is made this 25th day of November, 2013, between the Plaintiff, the UNITED STATES OF AMERICA, as represented by United States Attorney WILLIAM N. NETTLES and Assistant United States Attorney William J. Watkins, Jr., and the Defendant, GORDON L HALL.

IN CONSIDERATION of the mutual promises made herein and pursuant to the Final Record of Agreement (ECF # 82) (hereinafter "the Record") between the Plaintiff, UNITED STATES OF AMERICA, and an Accommodation Party for the Defendant, GORDON L HALL, and pursuant to a conditional response by the Defendant, GORDON L HALL, to a proposed PLEA AGREEMENT from the United States Attorney sent to the Defendant, GORDON L HALL, about the end of September, 2013 (hereinafter "INITIAL PLEA OFFER"), and pursuant to an informal response from the United States Attorney to the Defendant, GORDON L HALL's, PLEA AGREEMENT dated the 19th of November,

2013, and the provisions of the Federal Rules of Criminal Procedure, Rule 11, the parties hereto agree, as it applies to Criminal Case No. 6:13-cr-00170-JMC-1 in THE DISTRICT COURT OF THE UNITED STATES FOR THE DISTRICT OF SOUTH CAROLINA GREENVILLE DIVISION (hereinafter "This Court"), as follows:

1. The Defendant, GORDON L HALL, agrees and has entered a Plea of Nolo Contendere to the charges contained in the current Superseding Indictment;
2. The United States Prosecutor will move to dismiss all counts in the Superseding Indictment other than Count 2 against the Defendant, GORDON L HALL, as the United States Prosecutor offered as set forth in the INITIAL PLEA OFFER against the Defendant, GORDON L HALL, in This Court, and provided for under Rule 11(c)(1)(a) of the Federal Rules of Criminal Procedure;
3. The Defendant, GORDON L HALL, agrees to allow This Court to impute and enter a finding of Guilty of Count 2 to the Defendant, GORDON L HALL, so as to assist This Court in the public settlement of This Case;
4. The United States Prosecutor will take NOTICE of the Record of the substantive charges in this matter between the Plaintiff, The UNITED STATES OF AMERICA, and the Accommodation Party for the Defendant, GORDON L HALL;
5. The United States Prosecutor will agree not to oppose the Record of substantive settlement of the charges in This Court between the Plaintiff, The UNITED STATES OF AMERICA, and the Accommodation Party for the Defendant, GORDON L HALL;
6. Whereas the Defendant, GORDON L HALL, has caused to be returned to the UNITED

STATES OF AMERICA all property requested in This Case and the Civil Case 8:12-cv-02078-JMC, IN THE UNITED STATES DISTRICT COURT, DISTRICT OF SOUTH CAROLINA, ANDERSON/GREENWOOD DIVISION, that was the antecedent case to This Case; and

7. Whereas the Record entered in This Court at ECF#82 establishes Notice of private setoff of all accounting charges in This Court for This Case in favor of the Plaintiff, the UNITED STATES OF AMERICA, by the Accommodation Party for the Defendant, GORDON L HALL, including, but not limited to: fines, fees, court costs, interest, restitution, and any other payments required by This Court.

WHEREFORE PREMISES CONSIDERED, and pursuant to Federal Rules of Criminal Procedure, Rule 11(c)(1)(B) and (C), the United States Prosecutor agrees that:

a) the sentencing of the Defendant, GORDON L HALL, for Count 2 of the charges or any other charges that are a derivative of the Original Indictment or the Superseding Indictment, may contain any findings for imprisonment of any duration determined by This Court in privity with the charges as long as This Court grants credit to the Defendant, GORDON L HALL, for time already served, and provided that This Court suspends all further imprisonment of the Defendant, GORDON L HALL, on any the sentence on the basis of being in the interest of the public in the effective administration of justice;

b) furthermore if This Court sentences the Defendant, GORDON L HALL, to any supervised release in this matter it will be either suspended or unsupervised supervised release in the interests of the public in the effective administration of justice;

c) that This Court, if sentencing the Defendant, GORDON L HALL, to the payment of or the liability for any fines, fees, court costs, interest, restitution or any other payments to setoff

and settle the charges in This Case, will Order the accounting department of This Court to apply the one-hundred per cent (100%) setoff stipulated by the private Record as entered in This Court as the filing in ECF#82 to this accounting to give full credit to the Defendant to zero all account balances in This Court; and

d) charges in This Court of approximately three hundred fourteen thousand and 00/100 dollars (\$314,000.00) that the Government in the Plea Bargain agreement process claims is still due and owing for restitution, and that the Government's claims has not already been setoff as made manifest in the Record of Setoff Agreement set forth in ECF#82 of This Court, and that This Court will accept said tender for said setoff in the interest of the public in the effective administration of justice to zero all accounts herein without having to resort to any publically issued Wall Street bonds.

The Defendant and the United States Prosecutor agree that a written copy of this executed Amended Plea Agreement, pursuant to Rule 11(c)(2) of the Federal Rules of Criminal Procedure, will be entered into This Court, in open court or in camera, according to the discretion of This Court.

The Parties hereby agree that this Amended Plea Agreement contains the entire agreement of the Parties; that this Amended Plea Agreement supersedes all prior promises, representations and statements of the Parties; that this Amended Plea Agreement shall not be binding on any Party until This Court accepts the Defendant's plea of nolo contendere to This Court having jurisdiction over this matter; that this Amended Plea Agreement may be modified only in writing and signed by all Parties; and that any and all other promises, representations and statements, whether made prior to, contemporaneous with or after this Amended Plea Agreement, are null.

11/25/13
DATE

Gordon L. Hall
GORDON L HALL, Defendant

WILLIAM N. NETTLES
UNITED STATES ATTORNEY

DATE

BY:

William J. Watkins, Jr.
Assistant U. S. Attorney

CERTIFICATE OF SERVICE

It is hereby certified that on the date noted below, the undersigned mailed to:

cc: William J Watkins, Jr
US Attorneys Office (Gville)
55 Beattie Place, Suite 700
Greenville, South Carolina 29601

William N Nettles
US Attorneys Office (Gville)
55 Beattie Place, Suite 700
Greenville, South Carolina 29601

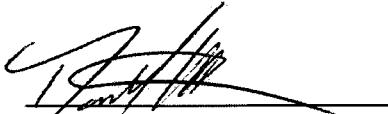
Serviced By: USPS "Certificate of Mailing" (PS Form 3817)

hereinafter, "Recipient," the documents and sundry papers pertaining to Case #: 6:13-cr-00170-JMC-1, as follows:

- 1) **AMENDED PLEA AGREEMENT**, dated 25 November 2013 (5 leaves); and
- 2) Reference copy of this **CERTIFICATE OF SERVICE**, dated 25 November 2013 (1 leaf).

These mailings contained a total of six (6) leaves each. They were sent via the United States Postal Service under the control, direction, and instruction of the USPS "Certificate of Mailing" (PS Form 3817) as referenced above. The aforesaid mailings were placed in postpaid envelopes properly addressed to the Recipient. They were deposited at an official depository under the exclusive care and custody of the United States Postal Service within the State of Arizona.

25 November 2013
DATE



Daniel Hall
3546 East Presidio Circle
Mesa, Arizona [85213]

From:
GORDON L HALL and BENTON T HALL
Defendants
SPARTANBURG COUNTY DETENTION FACILITY
950 California Avenue
Spartanburg, South Carolina [29303]
Leroynildebet@gmail.com

November 27, 2013

To:
William N. Nettles
United States Attorney
c/o William J. Watkins Jr.
US Attorneys Office (Gville)
55 Beattie Place, Suite 700
Greenville, South Carolina 29601

RE: SECOND NOTICE AS TO AMENDED PLEA AGREEMENT in Case #: 6:13-cr-00170-JMC

**NOTICE TO PRINCIPAL IS NOTICE TO AGENT
NOTICE TO AGENT IS NOTICE TO PRINCIPAL**

Dear Sir:

First, the Undersigned wants to thank you for the meeting that was held on Monday, November 25th, 2013, regarding the negotiations for the Amended Plea Agreement between the Parties based upon the latest written Amended Plea Agreement dated November 25, 2013, submitted by the Undersigned to the Government.

The written Amended Plea Agreement dated the 25th of November, 2013, was a full response to the issues the Government was concerned about in the Plea Agreement dated November 15th, 2013, that had been submitted by the Defendants to the Government. These issues concerned a sentencing of prison time and an unpaid fee. The provisions for dealing with these issues are fully covered in the Amended Plea Agreement dated November 25th, 2013, to resolve both issues.

Considering the issues covered in the Monday meeting between the Government and the Defendants in Case #: 6:13-cr-00170-JMC (hereinafter "This Case"), it has been established that there are no more objections on the Government's part or the Defendants' part to the submission of the Amended Plea Agreement dated November 25th, 2013, and drawn under the provisions of the Federal Rules of Criminal Procedure (hereinafter "FRCrP") Rule 11 inclusive. It is the intent of the Defendants to file this Amended Plea Agreement into the Court according to the provisions of FRCrP Rule 11(c)(2) prior to December 6th, 2013.

CONSIDER THIS COMMUNICATION **NOTICE** that the Government has assented to or does not object to the entry of this Amended Plea Agreement dated November 25th, 2013, under the provisions of FRCrP Rule 11(c)(2) as the Amended Plea Agreement between the Government and the Defendants in This Case, unless the Government responds within three (3) days of receipt hereof of this Written NOTICE, in writing, served upon the Defendants at the following mailing address:

Yiwen Krus
295 North Rural Road, Suite 147
Chandler, Arizona [85226]
Lady.krus@gmail.com
(480) 444-8365

stating with particularity any objection authorized by the provisions of the FRCrP Rule 11 inclusive to the Amended Plea Agreement, and stating with particularity how said written objection can be justified upon the basis of:

- 1) being in the interest of the public in the effective administration of justice as it applies to this Case; and
- 2) show where the Plaintiff, The United States of America, has been damaged and not received full compensation and recovery of all property set forth in the Pleadings of the United States of America in both the Civil Case 8:12-cv-02078-JMC, and the Criminal Case 6:13-cr-00170-JMC, that has not been fully addressed and resolved by the terms of the Amended Plea Agreement dated November 25th, 2013.

The Government stated in the meeting of November 25th, 2013, that the Government would not respond to the Amended Plea Agreement. Notice that failure to respond to the Amended Plea Agreement or to this NOTICE equates with assent, and the Defendants have an expectation to rely upon this assent in any hearing with the Court in this regard.

Again, the Undersigned respectfully appreciates the Government's professional and sincere efforts in the resolution of this matter by all Parties involved.

Sincerely,



GORDON L HALL, Defendant



BENTON T HALL, Defendant

CERTIFICATE OF SERVICE

It is hereby certified that on the date noted below, the undersigned mailed to:

cc: William J Watkins, Jr
US Attorneys Office (Gville)
55 Beattie Place, Suite 700
Greenville, South Carolina 29601

William N Nettles
c/o William J Watkins, Jr
US Attorneys Office (Gville)
55 Beattie Place, Suite 700
Greenville, South Carolina 29601

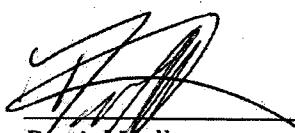
Serviced By: USPS "Certificate of Mailing" (PS Form 3817)

hereinafter, "Recipient," the documents and sundry papers pertaining to Case #: 6:13-cr-00170-JMC, as follows:

- 1) **SECOND NOTICE AS TO AMENDED PLEA AGREEMENT in Case #: 6:13-cr-00170-JMC**, dated 27 November 2013 (2 leaves); and
- 2) Reference copy of this **CERTIFICATE OF SERVICE**, dated 27 November 2013 (1 leaf).

These mailings contained a total of three (3) leaves each. They were sent via the United States Postal Service under the control, direction, and instruction of the USPS "Certificate of Mailing" (PS Form 3817) as referenced above. The aforesaid mailings were placed in postpaid envelopes properly addressed to the Recipient. They were deposited at an official depository under the exclusive face and custody of the United States Postal Service within the State of Arizona.

27 November 2013
DATE



Daniel Hall
3546 East Presidio Circle
Mesa, Arizona [85213]

GORDON L HALL
BENTON T HALL
Defendants
Spartanburg County Detention Facility
950 California Avenue
Spartanburg, South Carolina
leroynildebet@gmail.com
(480) 444-8365

NOTICE OF DEFAULT
CONSENT TO JUDGMENT
AMENDED PLEA AGREEMENT—ADMINISTRATIVE PROCESS

December 4, 2013

To: William N Nettles & William J Watkins, Jr
US Attorney's Office (Gville)
55 Beattie Place, Suite 700
Greenville, South Carolina 29601
Bill.watkins@usdoj.gov

RE: NOTICE OF DEFAULT—CONSENT TO JUDGMENT AMENDED PLEA AGREEMENT—ADMINISTRATIVE PROCESS (AMENDED PLEA AGREEMENT date November 25, 2013 and SECOND NOTICE AS TO AMENDED PLEA AGREEMENT to Case #: 6:13-cr-00170-JMC dated November 27, 2013)

STATEMENT OF FACTS:

1. On November 25, 2013, GORDON L HALL and BENTON T HALL, hereinafter “Defendants”, made presentment of an AMENDED PLEA AGREEMENT to the Government, a record which is available upon request, for the settlement of Case #: 6:13-cr-00170-JMC, hereinafter “Criminal Case”, sent via USPS “Certificate of Mailing” (PS Form 3817), by Daniel Hall, hereinafter “Presenter”, as evidenced by the “CERTIFICATE OF SERVICE” dated November 25, 2013, a record of which is available upon request.
2. On November 25, 2013 the AMENDED PLEA AGREEMENT is deemed received pursuant to the “Mailbox Rule”.
3. On November 25, 2013, the Government said that they would not respond to the AMENDED PLEA AGREEMENT for the settlement of the Criminal Case—meaning acceptance.
4. On November 27, 2013, the Defendants made presentment of SECOND NOTICE AS TO AMENDED PLEA AGREEMENT to Case #: 6:13-cr-00170-JMC, hereinafter “SECOND NOTICE”, for failure to respond to their refusal to respond in writing to the AMENDED PLEA AGREEMENT to the Government, requesting responses and correspondence be directed to Yiwen Krus as the third party witness, hereinafter “Third Party Witness,” a record which is available upon request, sent via USPS “Certificate of Mailing” (PS Form 3817), by the Presenter, as evidenced by the “CERTIFICATE OF SERVICE” date November 27, 2013.
5. On November 27, 2013, the SECOND NOTICE is deemed received pursuant to the “Mailbox Rule.”
6. As of December 3, 2013, the Government has not sufficiently responded to the SECOND NOTICE.

7. The Government's failure to sufficiently respond or timely honor the SECOND NOTICE, by the terms of the SECOND NOTICE, constitutes the Government's acceptance and approval of the AMENDED PLEA AGREEMENT.
8. As of December 3, 2013, neither the Defendants, Presenter, nor the Third Party Witness have received sufficient response to the SECOND NOTICE, thereby placing the Government in default, as evidenced by the "CERTIFICATE OF NON-RESPONSE" dated December 4, 2013, a record which is attached hereto.
9. The Government's failure to perform by the terms of the SECOND NOTICE constitutes the Government's mutual assent of the AMENDED PLEA AGREEMENT.
10. The Government has defaulted.
11. As an operation of law, the Government by dishonor of the SECOND NOTICE has created a default.

DEFAULT:

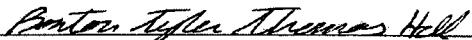
For the Government's failure to honor the SECOND NOTICE places the Government in **default**. For the course of dealing, set forth herein, with the Government's failure, refusal, or neglect in the presentation of a written response to the SECOND NOTICE constitutes the Government's acquiescence and tacit agreement with all terms, conditions, and stipulations set forth within this Notice of Default--Consent to Judgment Amended Plea Agreement—Administrative Process, SECOND NOTICE, and AMENDED PLEA AGREEMENT. Therefore, this matter is deemed *res judicata* and *stare decisis*.

Of this NOTICE OF DEFAULT--CONSENT TO JUDGMENT AMENDED PLEA AGREEMENT—ADMINISTRATIVE PROCESS, take due **notice** and heed, and govern yourself accordingly. This **FINAL EXPRESSION OF AGREEMENT IN A RECORD** is intended as a complete and exclusive statement of the terms of the agreement between the Parties.

Respectfully,



GORDON L HALL, Defendant



BENTON T HALL, Defendant

CERTIFICATE OF NON-RESPONSE

Arizona Republic)
Maricopa County) affirmed and subscribed:
Without the United States)

PRESENTMENT Be it known that, William N Nettles, in care of William J Watkins, Jr at US Attorney's Office (Gville), 55 Beattie Place, Suite 700, Greenville, South Carolina 29601, hereinafter, "Respondent," was duly served a SECOND NOTICE AS TO AMENDED PLEA AGREEMENT to Case #: 6:13-cr-00170-JMC signed by GORDON L HALL and BENTON T HALL, dated 27 November 2013, hereinafter, "Presentment" by Daniel Hall at 3546 East Presidio Circle, Mesa, Arizona [85213], hereinafter, "Presenter," at the request of GORDON L HALL and BENTON T HALL in care of Spartanburg County Detention Facility at 950 California Avenue, Spartanburg, South Carolina, via USPS "Certificate of Mailing" (PS Form 3817), on 27 November 2013, as evidenced in the CERTIFICATE OF SERVICE on the last leaf of the Presentment, requesting a written response from the Respondent be sent to Yiwen Krus at 295 North Rural Road, Unit 147, Chandler, Arizona, hereinafter, "Third Party Witness," within three (3) days of the post marked date of the Presentment, establishing any objections, if any, to the Amended Plea Agreement served to the Respondent on 25 November 2013 in Case #: 6:13-cr-00170-JMC, USA vs. Hall et al. IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA, GREENVILLE DIVISION, the time limit having elapsed for a timely response or performance thereto, resulting in a default by non-response by the Respondent.

DEFAULT: Whereupon, the person signing below, for the reason of **default by non-response**, does publicly and solemnly certify the default as against all parties it may concern by reason of non-response thereof and **stipulations therein**.

NOTICE: The undersigned certifies that on 4 December 2013, a NOTICE OF DEFAULT CONSENT TO JUDGMENT AMENDED PLEA AGREEMENT—ADMINISTRATIVE PROCESS was authenticated to be sent to the parties noted below by depositing in an official depository under the exclusive face and custody of the United States Post Office within the State indicated herein a sealed envelope containing said Notice(s) directed to the respective person or entity at the last known corresponding address noted below:

NAME	ADDRESS
William N Nettles c/o William J Watkins, Jr	US Attorney's Office (Gville) 55 Beattie Place, Suite 700 Greenville, South Carolina 29601 USPS "Certificate of Mailing" (PS Form 3877)
William J Watkins, Jr	US Attorney's Office (Gville) 55 Beattie Place, Suite 700 Greenville, South Carolina 29601 USPS "Certificate of Mailing" (PS Form 3877)

TESTIMONY I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: 4 December 2013

Yiwen Krus, Third Party Witness
295 North Rural Road, Unit 147
Chandler, Arizona [85226]
Non-domestic without the United States
Lady_krus@gmail.com

CERTIFICATE OF SERVICE

It is hereby certified that on the date noted below, the undersigned mailed to:

William N Nettles
c/o William J Watkins, Jr
US Attorneys Office (Gville)
55 Beattie Place, Suite 700
Greenville, South Carolina 29601

cc: William J Watkins, Jr
US Attorneys Office (Gville)
55 Beattie Place, Suite 700
Greenville, South Carolina 29601

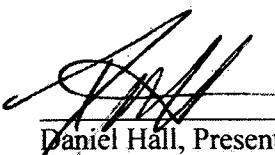
All Serviced By: USPS "Certificate of Mailing" (PS Form 3817)

hereinafter, "Recipients," the documents and sundry papers pertaining to Case #: 6:13-cr-00170-JMC, as follows:

- 1) **NOTICE OF DEFAULT CONSENT TO JUDGMENT AMENDED PLEA AGREEMENT—ADMINISTRATIVE PROCESS**, dated 4 December 2013 (2 leaves);
- 2) **CERTIFICATE OF NON-RESPONSE**, dated 4 December 2013 (1 leaf); and
- 3) Reference copy of this **CERTIFICATE OF SERVICE**, dated 4 December 2013 (1 leaf).

These mailings contained a total of four (4) leaves each. They were sent via the United States Postal Service under the control, direction, and instruction of the USPS "Certificate of Mailing" (PS Form 3817) as referenced above. The aforesaid mailings were placed in postpaid envelopes properly addressed to the Recipients. They were deposited at an official depository under the exclusive care and custody of the United States Postal Service within the State of Arizona.

4 December 2013
DATE



Daniel Hall, Presenter
3546 East Presidio Circle
Mesa, Arizona [85213]